

Aleksey Gurtovoy
4362 E Court St
Iowa City, IA 52245

September 3, 2019

Derek Frank
Public Information Officer
Iowa City Police Department
410 E. Washington St.
Iowa City, Iowa 52240

Dear Sgt. Frank:

Under the Iowa Open Records Law §22.1 et seq. and on behalf of a local non-profit citizens' group StopBigBrother.org, I am requesting an opportunity to inspect or obtain copies of all public records concerning, related to, or mentioning any relationship between the Iowa City Police Department (ICPD) and Ring, Inc. (Ring), a home security and smart home company, including but not limited to:

1. All records of any communications between the ICPD and Ring, Inc.
2. All records of any communications between the ICPD and the City of Iowa City concerning, related to, or mentioning:
 - 2.1. any relationship between the ICPD and Ring;
 - 2.2. any of Ring's products, services and/or apps.
3. All records of any communications between the ICPD and any other entity or person, including but not limited to local, state, or federal government entities, police and sheriff departments, police associations, U.S. Immigration and Customs Enforcement, companies, private citizens and press, concerning, related to, or mentioning:
 - 3.1. any relationship between the ICPD and Ring;
 - 3.2. any of Ring's products, services and/or apps.
4. All records of all and any relationships between the ICPD and Ring, Inc., including any accompanying financial records.
5. All records concerning, related to, or mentioning Ring's products, services and/or apps that were obtained, received, supplied to, used by, authored, produced or possessed by the ICPD, including but not limited to Ring's marketing materials, terms of service, privacy policies, data access, storage, release and/or retention policies, as well as ICPD's policies on monitoring and responding to incidents and/or videos posted to the Ring's "Neighbors" feed.

6. All records relating to the planning, coordination, execution of, and follow up on any training, workshop, seminar, orientation or any other type of familiarization concerning, related to, or mentioning Ring, and/or its products, services and/or apps.
7. All records concerning, related to, or mentioning requests for video footage issued, sent or otherwise initiated by the ICPD through Ring's platform, products, services and/or apps, including but not limited to the number, frequency and geographic area of the requests.
8. All records concerning, related to, or mentioning providing Iowa City residents with information about Ring products, services and/or apps.
9. All records concerning, related to, or mentioning data access, retention, storage and/or release policies for the video footage obtained, received, supplied to, used by, accessed or possessed by the ICPD through the Ring platform, products, services and/or apps.

The terms “Iowa City Police Department” and “ICPD” as used in this request refer to any officer, employee, official, agent, representative, contractor or other personnel of the Iowa City Police Department and any of its subsidiaries, branches, divisions, agencies, representatives, and affiliates.

The term “City of Iowa City” as used in this request refers to any council member, board member, officer, employee, official, agent, representative, contractor or other personnel of the City of Iowa City and any of its subsidiaries, branches, divisions, agencies, representatives, and affiliates.

The terms “Ring, Inc.” and “Ring” as used in this request refer to the company itself, as well as any board member, officer, employee, official, agent, representative, contractor or other personnel of Ring, Inc., and any of its subsidiaries, branches, divisions, agencies, representatives, and affiliates.

The term “relationship” as used in this request includes but is not limited to, any relationship, contract, partnership, agreement, arrangement, commitment, transaction, intent, understanding, joint venture, or any other form of collaboration, formal or informal, between the corresponding parties as defined in this request.

The term “records” as used in this request includes but is not limited to all records or communications preserved in written or electronic form, including but not limited to correspondence, documents, data, video recordings, audio recordings, faxes, files, emails, text messages, guidance, guidelines, evaluations, instructions, analyses, memoranda, agreements, notes, orders, policies, procedures, protocols, reports, rules, orders, practices, technical manuals, training manuals, or studies. Such records include any

records or communications within the scope of this request that were obtained, received, sent, produced, used or possessed by the ICPD and/or City of Iowa City personnel on their personal electronic devices and/or using personal electronic accounts.

I request that any records that exist in electronic form be provided in electronic format, and, if feasible, delivered via email to the following email address:
team@stopbigbrother.org.

As available on a case by case basis, I also request a waiver of all fees that may result from responding to this request for records, on the basis that the disclosure of the requested information is in the public interest and will contribute significantly to the increasing public's understanding of the nature of the public-private relationship between the Iowa City Police Department and Ring, Inc. The information obtained through this request will provide crucial context and much-needed transparency on this matter and will be shared freely with the public to inform public debate. No information obtained through this request will be used for commercial purposes.

Should you deny the fee waiver request, I ask to be informed at your earliest convenience if the fees associated with this request will exceed \$25. In the event that fees are assessed, I request a breakdown of the estimated cost. The Iowa Open Records Law requires a response time within ten to twenty business days. If access to the records I am requesting will take longer than that time period, please contact me with information about when I might expect copies or the ability to inspect the requested records.

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

Please send all notifications and/or responses to team@stopbigbrother.org. If you have any questions regarding this request, please don't hesitate to contact me at 319-936-0565 or team@stopbigbrother.org. Thank you in advance for your time and response to this request.

Sincerely,



Aleksey Gurtovoy
StopBigBrother.org
319-936-0565
team@stopbigbrother.org